

To: Chew, Andrew[Chew.Andrew@epa.gov]
Cc: Lawrence, Kathryn[Lawrence.Kathryn@epa.gov]
From: Don't Waste Arizona
Sent: Fri 3/4/2016 4:14:03 PM
Subject: Hickman's facilities in AZ should be reporting under CERCLA 103 and EPCRA 304 as well as TRI for hydrogen sulfide and ammonia
[hickmans 2012 Characteristics of ammonia, hydrogen sulfide, carbon dioxide, and particulate.pdf](#)

After reviewing the attached files and reviewing the materials at <http://animalagteam.msu.edu/uploads/files/20/Region%205%20poultry%20estimator.pdf> and <https://www3.epa.gov/region9/ag/workshop/nitrogen/2013/zhang-presentation-reactive-nitrogen-workshop.pdf>, it is quite apparent that Hickman's facilities in Arlington and Tonopah, AZ, should be reporting under the Toxics Release Inventory for Hydrogen Sulfide (CAS# 7783-06-4) as well as Ammonia (CAS# 7664-41-7).

Further, both facilities should also be reporting, and should have been reporting under CERCLA Section 103 and EPCRA Section 304 for both chemicals every day for years. I see no evidence that that mandatory reporting has been taking place.

Also, we have just received information that the children at the Arlington Elementary School (approximately three miles from the Hickman's Arlington facility) often have to be kept inside the school because ammonia levels outside are too high and cause respiratory distress. I urge immediate EPA intervention to prevent a health disaster.

Thank you for your time and attention to this urgent matter.

Sincerely,

Stephen Brittle

President Don't Waste Arizona